

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**ARAB AMERICAN CIVIL RIGHTS
LEAGUE**, et al.,

Plaintiffs,

v.

DONALD TRUMP, et al.,

Defendants.

Case No. 2:17-cv-10310-VAR-SDD

Hon. Victoria A. Roberts

Mag. J. Stephanie D. Davis

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO RE-
SCHEDULE MOTION HEARING**

Plaintiffs are opposed to a one-week adjournment of the June 6 hearing on Defendants' motion to dismiss for one reason: Defendants have taken the position that the Court cannot order discovery to proceed until it has resolved Defendants' motion to dismiss. Plaintiffs disagree, but in light of Defendants' position, Plaintiffs are opposed to a delay in the hearing date to the extent it might result in a further delay in discovery.

There may be no basis for Plaintiffs' concern, however. For example, if the Court has concluded on the basis of the written submissions that at least one plaintiff has standing and at least one claim will survive, a delay in the hearing date for the motion to dismiss need not result in a delay in discovery.

In all events, counsel for Plaintiffs are available to proceed on whichever of the following dates the Court prefers: June 6, June 13, June 14, or the afternoon of June 15.

Dated: June 1, 2017

Respectfully submitted,

Counsel for Arab American Civil Rights League

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

Nabih H. Ayad (P59518)
645 Griswold St., Ste. 2202
Detroit, MI 48226
(313) 983-4600
nayad@ayadlaw.com

/s/ Rula Aoun

Rula Aoun (P79119)
4917 Schaefer Rd.
Dearborn, MI 48126
(313) 633-0231
rula@acrlmich.org

HAMMOUD, DAKHLALLAH &
ASSOCIATES, PLLC

/s/ Kassem M. Dakhlallah

Kassem Dakhlallah (P70842)
6050 Greenfield Rd., Suite 201
Dearborn, MI 48126
(313) 551-3038
kd@hdalawgroup.com

VIDA LAW GROUP, PLLC

/s/ Mona Fadlallah

/s/ Natalie C. Qandah

Mona Fadlallah (P64197)
Natalie C. Qandah (P58434)
43050 Ford Road, Suite 160
Canton, MI 48187
Phone: (734) 456-9004
Facsimile: (734) 456-9003
Mona@vidalawpllc.com
Natalie@vidalawpllc.com

Counsel for American Arab Chamber of Commerce

FARHAT & ASSOCIATES, PLLC

/s/ Helal Farhat

Helal Farhat (P64872)

Counsel for the American Arab
Chamber of Commerce

6053 Chase Rd.

Dearborn, MI 48126

(313) 945-5100

hfarhat@saflegal.com

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

Nabih H. Ayad (P59518)

Attorney for Plaintiffs

645 Griswold St., Ste. 2202

Detroit, MI 48226

(313) 983-4600

nayad@ayadlaw.com

**Counsel for Hend Alshawish, Salim Alshawish, Yousef Abdullah, Fahmi
Jahaf, and Mohamed Alshega**

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

Nabih H. Ayad (P59518)
Attorney for Plaintiffs
645 Griswold St., Ste. 2202
Detroit, MI 48226
(313) 983-4600
nayad@ayadlaw.com

/s/ Rula Aoun

Rula Aoun (P79119)
4917 Schaefer Rd.
Dearborn, MI 48126
(313) 633-0231
rula@acrlmich.org

HAMMOUD, DAKHLALLAH &
ASSOCIATES, PLLC

/s/ Kassem M. Dakhllallah

Kassem Dakhllallah (P70842)
6050 Greenfield Rd., Suite 201
Dearborn, MI 48126
(313) 551-3038
kd@hdalawgroup.com

VIDA LAW GROUP, PLLC

/s/ Mona Fadlallah

/s/ Natalie C. Qandah

Mona Fadlallah (P64197)
Natalie C. Qandah (P58434)
43050 Ford Road, Suite 160
Canton, MI 48187
Phone: (734) 456-9004
Facsimile: (734) 456-9003
Mona@vidalawpllc.com
Natalie@vidalawpllc.com

/s/ Ali K. Hammoud

Ali K. Hammoud (P73076)
6050 Greenfield Rd., Suite 201
Dearborn, MI 48126
(313) 551-3038
ah@hdalawgroup.com

**Counsel for American Civil Liberties Union of Michigan, Arab American and
Chaldean Council, Arab American Studies Association, Adeeb Saleh,
Sofana Bella, Hilal Alkatteeb and S.A., a minor through her
Parent and Next Friend, Hilal Alkatteeb**

/s/ Miriam Aukerman

Miriam Aukerman (P63165)
American Civil Liberties Union Fund
of Michigan
1514 Wealthy SE, Suite 242
Grand Rapids, MI 49506
(616) 301-0930
maukerman@aclumich.org

/s/ Samuel R. Bagenstos

Samuel R. Bagenstos (P73971)
Cooperating Attorney,
American Civil Liberties Union
Fund of Michigan
625 South State Street
Ann Arbor, Michigan 48109
(734) 647-7584
sbagen@gmail.com

/s/ Michael J. Steinberg

Michael J. Steinberg (P43085)
Daniel S. Korobkin (P72842)
Kary L. Moss (P49759)
American Civil Liberties Union Fund
of Michigan
2966 Woodward Avenue
Detroit, MI 48201
(313) 578-6814
msteinberg@aclumich.org

/s/ Margo Schlanger

Margo Schlanger (N.Y. Bar
#2704443 (3d Dept))
Cooperating Attorney,
American Civil Liberties Union
Fund of Michigan
625 South State Street
Ann Arbor, Michigan 48109
(734) 615-2618
margo.schlanger@gmail.com

/s/ Jason C. Raofield

Jason C. Raofield (D.C. Bar #463877)
Nishchay H. Maskay (D.C. Bar
#998983)
Covington & Burling LLP
One City Center
850 10th Street, NW
Washington, D.C. 20001
(202) 662-5072
jraofield@cov.com

CERTIFICATE OF SERVICE

This Notice was filed on June 1, 2017, via the Court's ECF system, which provides notice to all counsel of record.

/s/ Jason C. Raofield

Jason C. Raofield

(D.C. Bar #463877)